

**2nd Draft
Workplan Bucket 1
6/16/08**

Work Area 1: Measurement and Disclosure

This area of the IWG's effort focuses on SEPA's traditional processes for identifying, measuring, and reporting environmental impacts and how they will apply to both types of climate change impacts. Elements of SEPA that fall into this category include: categorical exemptions, the environmental checklist, SEPA threshold determinations, and the content of Environmental Impact Statements.

Priorities:

Priority near-term decisions:

1. What types of proposals will get reviewed for climate change impacts?
2. What aspects/characteristics of projects and non-projects need to be quantified and disclosed for measuring both a) climate change impacts from a proposal and b) impacts arising from the combination of a proposal's impacts and its vulnerabilities to predicted climate change impacts? Essentially, this is the question of "what are we measuring"?
3. Should we focus on non-project actions as a priority?
4. How should we integrate the state goals and other reference points for greenhouse gas reductions?

Priority near-term information collection:

1. What tools are available for calculating GHG emissions?
2. What resources are available for understanding how the climate is likely to change in Washington State? (i.e. a regional analysis of vulnerabilities that all agencies can use)
3. Can we consider the number and type of projects and non-projects typically considered under SEPA? How do these break out in terms of exemptions, determination of significance, etc. (e.g., % DNS, etc.)
4. Track and coordinate with workplans, decisions and products from the transportation and GMA groups that affect the SEPA IWG.

1. Brief Description of Bucket and Current SEPA Process

A. Measuring and documenting Climate Change Impacts of a Proposal

1. Identify the Proposal
 - a) Identify types of projects and non-project proposals that should be assessed for climate change impacts
 - b) Identify inconsistencies with current statutory and categorical exemptions
2. Identify the Types of Impacts
 - a) List both project-related and plan-related emissions that should be included in the environmental review (e.g., life cycle, direct and/or indirect emissions)?

3. Measure the Impacts

- a) Develop initial “screening” for climate change impacts from non-projects by using a modified environmental checklist, guidance and worksheets (inventory methodologies) to identify types of direct, indirect (secondary), cumulative impacts.
- b) Develop initial “screening” for impacts from projects by using modified environmental checklist, guidance and worksheets (inventory methodologies) to identify types of impacts (possibly direct, indirect, cumulative as well)

B. Measuring and Documenting Impacts of Climate Change on a Proposal

1. Identify the Proposal

- a) Identify types of projects and non-project proposals that should be assessed for vulnerabilities to climate change impacts.
- b) Identify inconsistencies with current statutory and categorical exemptions.

2. Identify the Types of Impacts

- a) List types of other impacts arising from the combination of the proposal’s (project and non-project) impacts and its vulnerabilities to predicted climate change impacts (such as the environmental and traffic impacts of the road that would be submerged by rising sea level).
- b) Consider the impacts to the full proposal including the mitigation components

3. Measure the Impacts

- a) Develop initial “screening” for “vulnerability impacts” for non-projects by using a modified environmental checklist, guidance and worksheets to identify types of direct, indirect (secondary), cumulative impacts.
- b) Develop initial “screening” for “vulnerability impacts” for projects by using modified environmental checklist, guidance and worksheets to identify types of impacts (possibly direct, indirect, cumulative as well).

C. Determination of Significance for Projects and Non-Projects

- 1. Develop criteria for threshold determination guidance for evaluating initial screening results.
- 2. Identify the role of state target levels for greenhouse gas emissions as potential criteria.
- 3. Review rules and determine need for clarification to incorporate criteria.

D. Analyze Impacts and Alternatives in an EIS

- 1. Develop guidance for additional analysis required for probable “significant” climate change impacts and “vulnerability impacts” from climate change.

2. Key Policy Decisions for SEPA IWG

A. General

1. What types of impacts to climate and impacts from climate change will be given the most attention? (What needs to be measured immediately vs. the types of impacts might be dealt with at a later date?)
2. Determine the degree (any limitations) that SEPA can be used to identify impacts of climate change on a proposal.
3. Should any project/nonproject types be excepted from climate change impact analysis (or not dealt with at this time)?
4. Should any categorical exemptions be added (may overlap with work area 3), modified, removed, or conditioned to address climate change?
5. How should the SEPA rules (checklist, EIS and other areas) related to collecting and analyzing information be revised or adopted to gather needed information on project and non-project climate impacts and vulnerabilities?
6. What level of analysis is appropriate for checklist vs. more comprehensive evaluation in EIS?
7. Determine acceptable systems for measuring emissions/impacts of a proposal plus the climate change impacts on a proposal.
8. Determine the level of assistance and tools provided by the state to SEPA lead agencies to address climate change.

B. Determining significance

1. Should we have a statewide significance threshold (based on GHG emissions, or possibly also water use, sea level or flood plain proximity)?
2. Should we use a zero threshold, no threshold, or a tiered threshold approach?
3. How do we define a significant impact in regards to impacts to climate from a project/plan (transportation congestion, increased vehicle miles traveled or energy consumption etc.)? Should standards be specified?
4. Should we provide guidance on how to quantify cumulative climate change impacts?
5. How do we define a significant impact with regards to impacts from climate change on a proposal (water availability, sea level or flood plain proximity, fire hazard zoning)? Should standards be specified?
6. Do we need to recommend a “grandfathering” of proposals already in progress to be exempt from climate change consideration?

C. Impact analysis

1. What constitutes an adequate climate impact analysis for an EIS? (both project and non-project)
2. How should climate change influence the range of alternatives?
3. What constitutes an adequate climate impact analysis for an environmental checklist?
4. Are there other environmental analysis approaches that could be used for analyzing climate issues? (planned actions, NEPA documented categorical exclusions)

D. Document Preparation

1. How will the preparation and distribution of draft documents change? (i.e. agencies and staff with expertise might be expanded)

E. Adaptation

1. Do existing SEPA rules/guidance for nonproject, GMA nonprojects, or planned actions need to be changed to include analysis of “vulnerability impacts” or impacts of climate change on a project?
2. Are there types of projects that could be impacted by climate change in the future? (e.g. irrigation) How should they be analyzed? Within those types, are there some that would further impact the environment by responding to the future “need” to protect that project (e.g. sea level rise impacting structures along the shoreline – future need for protection could be dikes, fill, bigger bulkheads. future impacts near existing floodplains and informed zoning decisions)

F. Alternatives

1. Should we develop guidance on identifying and analyzing alternatives that address climate change issues at the project definition and scoping stage?

3. Key Products to be Revised or Developed by the SEPA IWG

A. Guidance

1. Separate guidance for project proposals and non-project proposals
2. Possible supplemental climate change checklist as guidance
2. Guidance for proposals that include NEPA and SEPA review.

B. Tools

1. Collect and provide maps, modeling and other tools for assessing probable changes to existing environment from climate change impacts.
2. Measuring and modeling tools for greenhouse gas emissions.
3. On-line guidance linked into checklist.

C. Revised or Additional Environmental Checklist

1. Separate checklists for project and non-project actions

D. Other Proposed Rule Amendments/Statutory Language

1. Possible modifications and deletions to statutory and categorical exemptions to reflect identified types of proposals in need of evaluation.
2. Possible revision to other areas of rule related to threshold determination, EIS contents, etc.

E. Training

1. Develop a training plan and curriculum for lead agencies and applicants to address climate change impacts through SEPA.

4. Related Existing SEPA Rules, Statutory language, Guidance and Other Resources

A. Rules

1. Environmental checklist question (WAC 197-11-960)
2. Elements of the environment includes “climate” (WAC 197-11-444)
3. Threshold determination (WAC 197-11-330)
4. Categorical exemptions (WAC 197-11-305 and part nine)
5. EIS contents (WAC 197-11-440 and 442)

B. Statute

1. Statutory exemptions (RCW 43.21C)

C. Guidance

1. SEPA Handbook
2. SEPA Guidance for Project Applicants (soon to be on-line)

D. Other Resources

1. GMA, SMA, applicable regulations that overlap with SEPA requirements.
2. Related tools and other products from transportation and GMA working groups.

5. Related Decisions and Resources from Other States and Localities

A. King County

<http://www.metrokc.gov/permits/info/site/ClimateChange.aspx>

B. NEPA

<http://www.icta.org/doc/CEQ%20Petition%20Final%20Version%202-28-08.pdf>
<http://www.biologicaldiversity.org/swcbd/programs/policy/energy/CBD-vs-NHTSA-ruling-11-15-2007.pdf>

C. California

<http://www.capcoa.org/climatechange/>
<http://ag.ca.gov/globalwarming/ceqa.php>

D. Massachusetts

<http://www.mass.gov/envir/mepa/pdf/misc/GHG%20Policy%20FINAL.pdf>
http://www.mass.gov/envir/mepa/pdf/misc/GHG_response_comments_102207.pdf